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7 **IN THE UNITED STATES DISTRICT COURT**  
 8 **IN AND FOR THE DISTRICT OF NEVADA**

9 FEI FEI FAN, Plaintiff,  
 10 vs.  
 11 YAN YAO JIANG, and  
 12 WEI WU Defendant.

13 Case No.: 3:21-cv-00458-MMD-CSD

14 **Order Granting Plaintiff's Motion to  
 15 Extend the Dispositive Motion Deadline  
 16 Following Court-Ordered Amendment**

17 Plaintiff Feifei Fan respectfully moves this Court to extend the dispositive motion deadline  
 18 set forth in the operative Scheduling Order (ECF No. 142), pursuant to Federal Rule of Civil  
 19 Procedure 16(b)(4), following the Court's recent Order (ECF No. 227) granting leave to amend.  
 20 Good cause exists to permit Plaintiff to file a dispositive motion based on the forthcoming amended  
 21 complaint. In support of this motion, Plaintiff states as follows:

- 22 1. On June 24, 2025, the Court (ECF No. 227) partially granted Defendant's Rule 12(c)  
 23 motion and permitted Plaintiff to amend her complaint by July 23, 2025.
- 24 2. Plaintiff is preparing the amended complaint in accordance with ECF No. 227 to address  
 25 the Court-identified pleading deficiencies and clarify the scope of surviving claims.
- 26 3. The current deadline requires Plaintiff to file her motion for summary judgment twelve  
 27 days before her amended complaint is due—effectively requiring Plaintiff to file her  
 28 summary judgment motion before her amended complaint becomes operative.
- 29 4. While Defendant has already filed a summary judgment motion based on the current  
 30 complaint (ECF No. 228), Plaintiff cannot fairly submit a corresponding motion without a  
 31 short extension following amendment.

5. An extension to July 30, 2025 will allow Plaintiff to submit her motion for summary judgment based on amended pleadings that reflect the Court's rulings, thereby promoting procedural efficiency. This brief extension aligns with the amendment deadline (July 23) and affords Plaintiff a narrow seven-day window to prepare a targeted dispositive motion based on the refined claims.
6. No party will be prejudiced by this request. Discovery is complete, and Defendant has already filed its dispositive motion. The requested extension is narrow, will not affect other deadlines, and pertains solely to Plaintiff's ability to file her motion for summary judgment after amending the complaint, as permitted by ECF No. 227.

WHEREFORE, Plaintiff respectfully requests that the Court extend the dispositive motion deadline from July 11, 2025 to July 30, 2025, and submits a proposed order herewith.

Respectfully submitted,  
Dated: July 09, 2025

Fei fei Fan.

Fei Fei Fan  
Plaintiff, Pro Se

## ORDER

Plaintiff's Motion to Extend the Dispositive Motion Deadline is GRANTED. The deadline set forth in the Scheduling Order (ECF No. 142) is extended from July 11, 2025 to July 30, 2025.

IT IS SO ORDERED.

Dated: July 11, 2025.

UNITED STATES DISTRICT JUDGE

1 Fei Fei Fan  
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13  
14 **CERTIFICATE OF SERVICE**

15 I, Fei Fei Fan, certify that on July 09, 2025, I served the following document(s):

16 • Plaintiff's Motion to Extend the Dispositive Motion Deadline Following Court-  
17 Ordered Amendment

18 on the following individuals by Electronic Filing (via CM/ECF system) indicated:

19 1. Courtney Miller O'Mara (Defendant's Attorney)  
20 2. Enrique Schaeerer (Defendant's Attorney)  
21 3. Kendall M. Lovell (Defendant's Attorney)  
22 4. MaryJo Smart Pinocchio (Defendant's Attorney)

23 I declare under penalty of perjury under the laws of the United States that the foregoing  
is true and correct.

24 Respectfully submitted,  
25 Dated: July 09, 2025

*Fei fei Fan.*

26  
27 Fei Fei Fan  
Plaintiff, Pro Se  
28